

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHARLES HADDAD,

Plaintiff,

-vs-

Case No. 04-CV-74932

Hon. ANNA DIGGS TAYLOR

INDIANA PACERS, an assumed name a/k/a PACERS
BASKETBALL CORPORATION, an Indiana corporation,
JERMAINE O'NEAL and ANTHONY JOHNSON,

Mag. Judge Donald A. Scheer

Defendants.

L.S. CHARFOOS (P11799)
JASON J. THOMPSON (P47184)
Attorneys for Plaintiff
5510 Woodward Avenue
Detroit, Michigan 48202
(313) 875-8080/FAX 8522

Potter, DeAgostino, O'Dea & Patterson
STEVEN M. POTTER (P33344)
Attorney for Indiana Pacers
2701 Cambridge Court, Suite 223
Auburn Hills, Michigan 48326
(248) 377-1700/FAX 0051

LAWRENCE G. CAMPBELL (P11553)
BRIAN M. AKKASHIAN (P55544)
RICHARD M. APKARIAN, JR. (P66206)
Attorneys for Jermaine O'Neal
500 Woodward Avenue, Suite 4000
Detroit, Michigan 48226
(313) 223-3500

THOMAS W. CRANMER (P25252)
MATTHEW F. LEITMAN (P48999)
HIDEAKI SANO (P61877)
Attorneys for Anthony Johnson
150 W. Jefferson, Suite 2500
Detroit, Michigan 48226
(313) 496-7651

WILLIAM D. TEMKO
JOSEPH YBARRA
Co-Counsel for Jermaine O'Neal
355 S. Grand Avenue, 35th Floor
Los Angeles, California 90071
(213) 683-9266

DEFENDANT INDIANA PACERS' SUPPLEMENTAL WITNESS AND EXHIBIT LIST

NOW COMES Defendant INDIANA PACERS a/k/a PACERS BASKETBALL CORPORATION, by and through counsel, Potter, DeAgostino, O'Dea & Patterson, and provide Defendant's Supplemental Witness and Exhibit List as follows:

1. Any and all of Plaintiff's treating physicians, therapists, and other medical providers at Pontiac Osteopathic Hospital, 50 North Perry Street, Pontiac, MI 48342.
2. Any and all of Plaintiff's treating physicians, therapists, and other medical providers at William Beaumont Hospital, 3601 West 13 Mile Road, Royal Oak, MI.
3. Any and all of Plaintiff's treating physicians, therapists, and other medical providers at Valley Urgent Care, 3020 Boardwalk, Saginaw, MI 48603, including but not limited to: Dr. John Kemerer.
4. Any and all of Plaintiff's treating physicians, therapists, and other medical providers at Covenant Healthcare, 1447 N. Harrison, Saginaw, MI 48620 including, but not limited to: Dr. Renee Milan.
5. Dr. Joel Beltran, 800 Cooper, Suite 11, Saginaw, MI 48602
6. Dr. Bong Jung, 4705 Towne Centre Road, Suite 304, Saginaw, MI 48604
7. American Medical Response of Michigan, P.O. Box 100217, Atlanta, GA 30384
8. Custodian of the Records for Social Security Administration, Lansing, MI.
9. Custodian of the Records of Chesaning High School, 850 N. Fourth Street, Chesaning, MI 48616.
10. Custodian of the Records of Burt Enterprises, Inc., 9538 East Street, Burt, MI 48417, including, but not limited to Plaintiff's Supervisor.
11. Custodian of the Records of Internal Revenue Service.
12. Custodian of the Records of Palace Sports & Entertainment, Auburn Hills, Michigan.
13. Stanley Berent, Ph.D. - Neuropsychology Expert
NeuroBehavioral Resources, Inc.
325 East Summit
Ann Arbor, Michigan 48104
14. Robert B. Forney, Jr., Ph.D., DABFT - Toxicology Expert
8825 West Bancroft
Toledo, Ohio 43617
15. Gary Wayne Kunsman, Ph.D., DABFT - Toxicology Expert
ForTox Consulting
2665 Greenstone Blvd., No. 814
Auburn Hills, Michigan 48326

16. Edward Primeau - Audio/Video Forensics Expert
Primeau Productions, Inc.
1032 N. Crooks Rd., Suite F
Clawson, Michigan 48017
17. Alan Felthous, M.D. - Psychiatry Expert
Chester Mental Health Center
P.O. Box 31
Chester, Illinois 62233-0031
18. Independent medical examiners to be identified.
19. All witnesses including expert witnesses identified on Plaintiff's and Co-Defendants' Witness Lists.
20. Any and all witnesses including experts identified on Defendant's previously filed witness lists.
21. Any and all rebuttal witnesses.
22. Any and all witnesses discovered through the course of discovery.
23. All witnesses listed in answers to interrogatories, depositions and pleadings.
24. Defendant reserves the right to amend this Witness List at any time prior to trial.

EXHIBIT LIST

1. Any and all records including, but not limited to: documents, diagrams, pictures, videos, contracts, investigative reports, charts, faxes, letters, memorandums, notes, purchase orders, job specifications, employee manuals, and instructions from the Palace of Auburn Hills.
2. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Pontiac Osteopathic Hospital.
3. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from William Beaumont Hospital.
4. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Valley Urgent Care.

5. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Covenant Healthcare.
6. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Joel Beltran, M.D.
7. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Bong Jung, M.D.
8. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from American Medical Response.
9. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Social Security Administration.
10. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Chesaning High School.
11. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Burt Enterprises, Inc.
12. Any and all records including, but not limited to: reports, x-rays, nurses' notes, charts, diagrams, and correspondence from Internal Revenue Service.
13. Any and all exhibits identified on Defendant's previously filed Exhibit List.
14. Any and all exhibits referred to or attached to deposition transcripts.
15. Any and all exhibits listed on Plaintiff's and Co-Defendants' Exhibit Lists.
16. Any and all exhibits identified or obtained through the course of discovery.
17. Any and all pleadings in this case including, but not limited to: interrogatories, requests to admit, and requests to produce.
18. Any and all exhibits necessary for use in rebuttal.

19. Defendant reserves the right to amend this Exhibit List at any time prior to trial.

POTTER, DeAGOSTINO, O'DEA & PATTERSON

s/STEVEN M. POTTER (P33344)
Attorney for Defendant Indiana Pacers
2701 Cambridge Court, Suite 223
Auburn Hills, Michigan 48326
(248) 377-1700
spotter@potterlaw.com

Dated: March 31, 2006

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2006 I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following: JASON J. THOMPSON, BRIAN M. AKKASHIAN/RICHARD M. APKARIAN, and HIDEAKI SANO, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: LAWRENCE S. CHARFOOS, 5510 Woodward Avenue, Detroit, MI 48202, THOMAS W. CRANMER, 150 W. Jefferson, Suite 2500, Detroit, Michigan 48226, MATTHEW F. LEITMAN, 840 W. Long Lake Road, Suite 200, Troy, MI 48098, and WILLIAM D. TEMKO/JOSEPH YBARRA, 355 S. Grand Avenue, 35th Floor, Los Angeles, California 90071.

s/STEVEN M. POTTER (P33344)
Attorney for Indiana Pacers
2701 Cambridge Court, Suite 223
Auburn Hills, Michigan 48326
(248) 377-1700
spotter@potterlaw.com